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February 20, 2025

Via ECF

Honorable Carol Bagley Amon
United States District Court
Eastern District of New York
225 Cadman Plaza East, Courtroom 10D South
Brooklyn, New York 11201

Re: *Tatari v. Durust*
Case No. 1:24-cv-06930-CBA-SJB

Dear Judge Amon:

Pursuant to Your Honor's Order dated February 13, 2025 (Notice of Electronic Filing, dated February 13, 2025), Mr. Tatari secured the Child's United States passports from the Clerk of Court on February 18, 2025. After retrieval, the Second Circuit ordered that the temporary stay be extended for panel review of the stay motion. As such, Mr. Tatari and the Child did not board their return flight to Turkey.

Given that it is unknown when the three-Judge panel will decide Respondent's stay motion, the parties respectfully and jointly request that the Clerk of Court be directed to hold all of the Child's passports until the stay motion or appeal is resolved, whichever occurs first.

Respectfully,

/s/ Richard Min
Richard Min
Attorney for Petitioner

/s/ Brett Ward
Brett S. Ward
Attorney for Respondent

cc: All Counsel (by ECF)

The parties' request is So Ordered. All of O.T.'s passports shall be deposited with the Clerk of Court.

Ordered by Judge Carol Bagley Amon on February 20, 2025

/s/ Carol Bagley Amon